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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

November 10, 1992

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: MM Docket No. 92-205 RM-8059
Reply Comments to Comments to Notice
of Proposed Rule Making
Belle Plaine, Iowa
AM&H #15115

Dear Ms. Searcy:

On behalf of Cynthia A. Siragusa, permittee of a new FM Station on Channel 238A at Belle Plaine, Iowa (BPH-910905MB, granted June 2, 1992) and Petitioner in the above-referenced Notice of Proposed Rule Making, there is transmitted herewith her Reply Comments to Comments to Notice of Proposed Rule Making filed by Washington Radio, Inc.

Should there be any question regarding the attached Reply Comments, please contact the undersigned.

Very truly yours,

Denise B. Moline
Denise B. Moline

DBM:wp
Attachment

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BEFORE THE
Federal Communications Commission
WASHINGTON, D.C.

FEDERAL COMMUNICATIONS COMMISSION
SECRETARY

In the Matter of)	MM DOCKET NO. 92-205
)	
Amendment of §73.202(b))	RM-8059
Table of Allotments)	
FM Broadcast Stations)	
(Belle Plaine, Iowa))	

To: Chief, Allocations Branch

REPLY TO COMMENTS TO NOTICE OF PROPOSED RULE MAKING

Cynthia A. Siragusa ("Siragusa") by Counsel, and pursuant to §§ 1.415 and 1.420 of the Commission's Rules, hereby respectfully submits her Reply Comments to the Comments filed by Washington Radio, Inc., ("WRI") Licensee of Station KCII-FM, Washington, Iowa. WRI requested a condition on the proposed substitution of Channel 238C3 for Channel 238A at Belle Plaine, Iowa, as set forth in the "Notice of Proposed Rule Making" ("NPRM") in the above-captioned proceeding.

WRI noted that the proposed substitution would interfere with the present operation of Station KCII-FM. KCII-FM's channel allocation was changed to accommodate allotment of Channel 237C1 at Keokuk, Iowa (Report and Order, MM Docket 89-451, 6 FCC Rcd 364 (1991)); however, KCII is still operating on channel 237A, pending grant of the upgrade modification application filed by KOKX-FM pursuant to the Report and Order in MM Docket 89-451, and payment by KOKX-FM for the reasonable costs incurred by WRI as a result of the required channel change for KCII-FM. WRI indicated its continuing willingness to make the channel change required in

Keokuk Report and Order, and requested that any adoption of Petitioner's proposal for substitution of Channel 238C3 at Belle Plaine, Iowa contain the condition that the Belle Plaine station delay commencement of program test operations on the substitute Channel until KCII commences operation on Channel 291A.


Siragusa is willing to accept the condition requested by Washington Radio, Inc., and herein reiterates her intention to construct and operate her station on Channel 238C3 if granted the proposed allotment, as originally set forth in its Petition in this proceeding.

WHEREFORE, the foregoing considered, Siragusa respectfully requests that the Commission GRANT her Petition and AMEND §73.202(b) of the Commission's Rules, the FM Table of Allotments, as set forth below, and MODIFY her permit for Belle Plaine, Iowa, subject to the condition requested by WRI.

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Belle Plaine, IA	238A	238C3

Respectfully submitted

CYNTHIA A. SIRAGUSA

By: 
Denise B. Moline
Her Attorney

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November 10, 1992

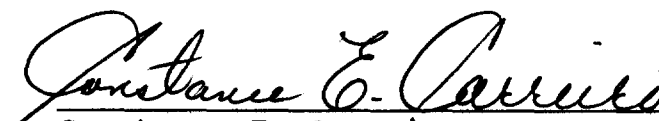
CERTIFICATE OF SERVICE

I, Constance E. Carreiro, secretary in the law firm of Allen, Moline & Harold hereby certify that I have caused to be served, this 10th day of November, 1992 a copy of the foregoing "Reply Comments to Comments to Notice of Proposed Rule Making" by first-class mail, postage prepaid, on the following:

* Michael C. Ruger
Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W., Room 8322
Washington, D.C. 20554

* Ms. Leslie K. Shapiro
Allocations Branch
Policy and Rules Division
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Counsel for Washington Radio, Inc.


Constance E. Carreiro

*Courtesy Copy, Hand-delivered